

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

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) MDL No. 2419
) Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

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) *Wray, et al. v. Ameridose, LLC, et al.*
) Civil Action Number 1:13-cv-12737-RWZ

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)
) *Ziegler, et al. v. Ameridose, LLC, et al.*
) Civil Action Number 1:13-cv-12588-737-RWZ

NOTICE OF DEPOSITION

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure and MDL Order No. 10 (Document #1426) the Plaintiffs' Steering Committee will take the deposition of Susan Riddick-Graham, R.N. on May 31, 2016 at 12:00 p.m. at SunTrust Center Downtown, Suite 1000, 919 East Main Street, Richmond, VA 23219. The deposition will be recorded by stenographical means and by video. A request for records is attached as Exhibit A hereto.

Dated: May 20, 2016

Respectfully submitted,

s/ Mark P. Chalos

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*Plaintiffs' Steering Committee and Federal/State
Liaison*

CERTIFICATE OF SERVICE

I, Mark P. Chalos, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: May 20, 2016

s/ Mark P. Chalos
Mark P. Chalos

EXHIBIT A

The word “documents” shall be defined to include any kind of written, typewritten, printed or recorded material whatsoever, including without limitation, statements, notes, transcription of notes, memoranda, letters, telefaxes, publications, agreements, pictures, photographs, audio tape recordings, video tape recordings, cassettes, transcriptions of any such recordings, log books, business records, and computer files or electronic data such as e-mails or instant messages.

Pursuant to the Federal Rules of Civil Procedure, this will serve as a request for the Deponent, expert witness Susan Riddick-Graham, R.N to produce the following documents at least seven days before the deposition:

1. All documents containing facts or data that was considered in forming the expert opinions.
2. All documents containing facts or data that the underlying party’s attorney provided to her and that she considered in forming the opinions to be expressed.
3. Copies of all scholarly literature on which she relied.
4. All exhibits that she intends to use to summarize or support the opinions.
5. All materials relevant to the opinions and the expert report in this case.
6. A list of all other cases in which she has testified as an expert at trial or by deposition within the previous 4 years.
7. All communications relating to compensation for the study or testimony.
8. All non-privileged communications relating to the report.
9. A current resume and curriculum vitae.

10. A list of all publications authored by the expert in the last ten years that relate to the issues in this case or the opinions in the report.

11. A copy of any report authored by the witness in the last ten years in any other case on any subject that the witness intends to testify on in this case.

12. A list of all materials (with enough specificity to identify the document) provided to the witness. However, if the witness has made notes on or otherwise marked on the documents provided, production of the original materials is requested.

13. Any notes taken by the witness in the course of developing her opinions in this case, including any notes taken on documents provided to the witness.

14. A copy of any invoices sent for the expert's services in this case.

15. A copy of the expert's fee schedule for services rendered as an expert witness.

16. A copy of any advertising the expert has done for expert witness services.